

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

SHERI MINARSKY,	:	
	:	
Plaintiff	:	CIVIL ACTION - LAW
	:	
v.	:	JURY TRIAL DEMANDED
	:	
SUSQUEHANNA COUNTY	:	JUDGE: ROBERT D. MARIANI
AND	:	
THOMAS YADLOSKY, JR,	:	
	:	
Defendants	:	NO. 3:14-CV-02021

**PROPOSED VOIR DIRE OF**  
**DEFENDANT SUSQUEHANNA COUNTY**

1. Does anyone know the Plaintiff, Sheri Minarsky?
2. Does anyone know Plaintiff's counsel, David Koller?
3. Have you or any member of your immediate family ever been represented by David Koller?
4. Does anyone know Plaintiff's counsel, Stephanie Mensing?
5. Have you or any member of your immediate family ever been represented by Stephanie Mensing?
6. Does anyone know Dana Zlotucha or Jaime Hailstone?
7. Have you or any member of your immediate family been represented by Dana Zlotucha, Jaime Hailstone, or Kreder Brooks Hailstone?
8. Does anyone know Susquehanna County Commissioner Alan Hall?

9. Does anyone know Susquehanna County Commissioner MaryAnn Warren?

10. Does anyone live in Susquehanna County?

11. Does anyone or any member of your immediate family work for Susquehanna County or worked there in the past?

12. Does anyone know the following witnesses who may testify at trial: (review witness list).

13. This case involves a claim by Plaintiff for sexual harassment/hostile work environment under Title VII, and a claim for assault, – has anyone heard about this case before or read any news accounts involving this case?

14. Does anyone have formal training or education on the area of sexual harassment?

15. Have you or any member of your immediate family been subjected to sexual harassment or assault?

16. Have you or any member of your immediate family ever had an issue with sexual harassment at work?

17. Does anyone have strong opinions regarding sexual harassment or assault that would influence your decision in this case?

18. Does anyone have predetermined opinions regarding the “Me Too” Movement that would influence your decision in this case?

19. Have you or any member of your immediate family ever been a party to a Title VII/sexual harassment/hostile work environment claim?

20. Have you or any member of your immediate family ever brought criminal or civil charges for assault against another person?

21. Does anyone have any feelings toward the government or elected officials which would prevent you from rendering a fair and impartial verdict?

22. Does anyone have any physical problems, such as hearing or eyesight issues, which would prevent him or her from serving as a juror for the remainder of the week?

23. Does anyone have any other issue that would prevent him or her from serving as a juror for the remainder of the week?

24. Does anyone feel for any reason that they are unable to listen to the evidence in this case and render a fair and impartial verdict?

Respectfully submitted,

KREDER BROOKS HAILSTONE LLP

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Scranton, PA 18503  
(570) 346-7922

By: /s/ Dana M. Zlotucha  
Dana M. Zlotucha, Esquire  
Attorney I.D. #312346  
Attorney for Defendant Susquehanna County

Dated: January 11, 2019

CERTIFICATE OF SERVICE

AND NOW, this 11<sup>th</sup> day of January 2019, Dana M. Zlotucha, a member of the firm of Kreder Brooks Hailstone, LLP, attorneys for Defendants, hereby certify that I have this day served the within PROPOSED VOIR DIRE OF DEFENDANT SUSQUEHANNA COUNTY by electronic filing with the Clerk of the United States District Court for the Middle District of Pennsylvania using the CM/ECF system to the party or attorney of record as follows:

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*ATTORNEYS FOR DEFENDANT, YADLOSKY*

By: /s/ Dana M. Zlotucha